

RECEIVED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAR 27 2017 *AS*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Kenneth K TAYLOR

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

**1:17-cv-2348**

**Judge John Z. Lee**

**Magistrate Judge Sidney I. Schenkier**  
**PC4**

vs.

Case No: \_\_\_\_\_

(To be supplied by the Clerk of this Court)

JANE DOE's nurse John Doe's mental Health Staff  
John DOE's Security are sued in THEY individual and  
Employed CAPACITY Ingalls Memorial Hospital Department  
of Behavioral Health are sue Individual and  
Employed CAPACITY

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

\_\_\_\_\_

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

\_\_\_\_\_

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**



**I. Plaintiff(s):**

- A. Name: Kennado L Taylor
- B. List all aliases: Kennado Boyd Taylor
- C. Prisoner identification number: M-25370
- D. Place of present confinement: Pontiac CC
- E. Address: PO Box 99 Pontiac IL 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: JANE DOE  
Title: Nurse's  
Place of Employment: Ingalls Memorial Hospital
- B. Defendant: JANE DOE  
Title: Nurse's  
Place of Employment: Ingalls Memorial Hospital
- C. Defendant: John Doe  
Title: ~~mental health~~ STAFF  
Place of Employment: Ingalls Memorial Hospital

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)





**I. Plaintiff(s):**

- A. Name: Kennado JC Taylor
- B. List all aliases: Kennado Boyd Taylor
- C. Prisoner identification number: M-25320
- D. Place of present confinement: Pontiac CC
- E. Address: PO Box 99 Pontiac IL 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: John Doe  
Title: ~~mental health~~ staff  
Place of Employment: Ingalls Memorial Hospital
- B. Defendant: John DOE  
Title: Security  
Place of Employment: Ingalls Memorial Hospital
- C. Defendant: John DOE  
Title: Security  
Place of Employment: Ingalls Memorial Hospital

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)





IT CENTRAL District of Illinois Taylor v. Memenga Case No. 13C2174 Taylor v. Sangster No. 13C2175 Taylor v. Bukowski No. 12C2086 Taylor v. Godinez No. 12C152 Northern District of Indiana Taylor v. Porter Stark Hospital et al No. 11C0388 Sanctions dismissal not state litigation history Taylor v. Doe No. 16C9069 Taylor v. Doe Employee No. 16C9127 Case No. 13C2171 was sanctioned dismissal

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

Taylor v. Doe No. 11C5591 Taylor v. Sudkins No. 12C3390 Taylor v. Kameron No. 12C3130 321931 Taylor v. Darren No. 13C2171 Taylor v. Doe No. 16C9069 Taylor v. Kimberly No. 16C9212 Taylor v. Fox 17CV1051 Taylor v. Doe No. 17C1012 Taylor v. Illinois Department of Corrections 2012 2013 2016 if Carr 17C01013

A. Name of case and docket number: Taylor v. Croft No. 13C2930 Taylor v. Baker

B. Approximate date of filing lawsuit: 2011 2012 2013 2016

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Kennada K. Taylor Kennada Boyd Taylor

D. List all defendants: Doe / Johnson / Yasin / Sudkins / Kameron / Croft / Baker / Darren / Doe / Memenga Sangster Bukowski / Godinez / Porter Stark Hospital / Doe / Doe Was Sanctioned dismissal 13C2171

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern of Indiana Northern of Illinois Central District of Illinois

F. Name of judge to whom case was assigned: Kennelly J / Cee S. Darras J / Simon S. J.

G. Basic claim made: deny mental health care / excessive force deny medical care in treatment

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Appealed No. 16C9212 16C9217 16C9069 Plaintiff dismissed Appealed not still pending Some sanctioned dismissal not state litigation history Some case I win the case was put to settle by a lawyer

I. Approximate date of disposition: 2011 2012 2013 2016 2/19/17

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

JURISDICTION & VENUE This is A Civil Action Authorized By 42 U.S.C. Section 1983 to redress THE DEPRIVATION Under color of STATE LAW of Rights Secured By THE Constitution of THE United States & THE Court has Jurisdiction Under 28 U.S.C. Section 1331 and 1343(A)(3) Plaintiff Seeks Declaratory relief pursuant to 28 USC Section 2201 and 2202 Northern District of Illinois is an Appropriate Venue Under 28 U.S.C. Section 1391(b)(2) BECAUSE it is where THE events giving rise to this claim occurred On THE Above Date About 8/20/16 I Was At Ingalls Memorial Hospital Department of Behavioral Health One Ingalls Drive HARVEY Illinois 60426 (908) 333-2300 Phone No 1 On About 8/20/16 I Was having very BAD Pain in my Right leg to THE SAME DOE Nurse's and ~~THEY~~ THEY failed to respond to my complaints About my serious pain I Suffered a Injury From playing BALL When I Was At Home SO THE SAME DOE Nurse's got up Set About me Complaint and State to me You getting A PRN Shoot I ASK





FOR WHAT I HAVE NOT DID ANY THING LONG AT  
 ALL THEN THE TWO JOHN DOE STAFF TRYING FAILING  
 TO ME IN GETTING ME TO TAKE THE PRN SHOOT  
 THEN I TOLD THE TWO JOHN DOE STAFF IF  
 THEY GIVE ME A PRN I AM GOING TO KILL MY  
 SELF AND HURT MY SELF VERY BAD THEY THEN  
 TOLD ME IF YOU KILL YOUR SELF THAT ON YOU MS  
 TAYLOR SO IF YOU WANT TO KILL YOUR SELF DO IT  
 I HAD ISSUE BEFORE WITH ONE OF THE JOHN DOE  
 STAFF THAT TOLD ME TO KILL MY SELF SO THE  
 JANE DOE NURSE'S CAME IN MY ROOM WHERE  
 IT WAS A VIDEO CAMERA DEVICE THAT TOOK PHOTOGRAPHS  
 OF THE ISSUE IN TOLD ME IF YOU DO NOT TAKE THE  
 PRN I AM CALLING SECURITY IN YOU GOING TO TAKE THE  
 PRN SO I THEN TOLD THE JANE DOE NURSE'S IF  
 YOU GIVE ME THE PRN SHOOT I AM GOING TO KILL MY  
 SELF THEN THE JANE DOE NURSE'S SAID YOU NOT GOING  
 TO KILL YOUR SELF YOU JUST ACTING OUT WRITE NOW  
 MS TAYLOR THEN I SAID THAT MY WORD I AM GOING  
 TO TRY KILLING MY SELF THEY THEN CALL SECURITY  
 THE TWO JOHN DOE SECURITY OFFICERS YOU HAVE TO  
 TAKE THE SHOOT OR WE WILL HAVE TO MAKE YOU  
 TAKE IT THEN I TOLD THE TWO JOHN DOE  
 SECURITY OFFICERS IF I HAVE TO TAKE THIS  
 SHOOT I AM GOING TO KILL MY SELF IN





and you will be coming back up hear one of the John DOE Security Officer was one of some security officers dump me before then he state to me you not going to kill you self because you would have not told us you just play a game if you going to do it we can not stop you I was in fear for my life so I took the pen shoot then I told all them again when they was walking I am going to kill my self I then took some glue's eat some GASS and cut my left four arm THE mark will never go away then THE SAME DOE NURSE'S CALL Security Back up to THE unit then I was sent to THE Out Side Hospital Injails memorial Hospital wear THE medical RECORD will show FOR PROOF of my Injury and other issue to ALL THE Defendants was Deliberate Indifference By not Respond Reasonably and knew that I was going to try Killing my self ALL THE Defendants Failure to treat my Condition result further Significant Injury to my Body and Four arm's it was unnecessary Wanton infliction of pain and this was negligent mental Health is A Serious medical need so Defendants Violation my Eighth Amendment and my Constitutional Rights and THE fail to keep me safe from harm



V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

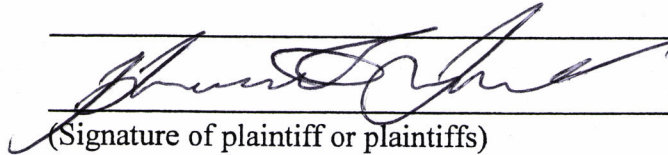
① Seeking Punitive DAMAGES of \$250,000  
② Seeking Compensatory DAMAGES of \$350,000

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 3 day of 16, 20 17



(Signature of plaintiff or plaintiffs)

Kenneth K + Taylor

(Print name)

M-25320

(I.D. Number)

PO Box 99

PONTIAC IL 61761

(Address)

